

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATHERINE GODFREY, GAIL MORRIS,
TAMALA WATKINS, EVELYN DAVIS,
MONICA DENTLEY, and CARLA LLOYD,
individually and on behalf of all others
similarly situated; and KIMBERLY BAILEY,
MILDRED BROWN, LYNETTE COLLINS,
LONETTA CURTIS, LAURA HENRY,
LYNETTE MOORE, ERICA D. SANDERS,
GWEN STEVENSON, YOLANDA WEBB,
SHEILA WILLIAMS, DANITA WILLIAMS,
and LETREONA WOODS, individually;

Plaintiffs,

v.

THE CITY OF CHICAGO, a municipal
corporation;

Defendant.

Case No. 12 C 8601

Judge Sara L. Ellis

Magistrate Judge Maria Valdez

PLAINTIFFS' MOTION TO EXTEND TIME FOR FACT AND EXPERT DISCOVERY

Plaintiffs, by their undersigned counsel, respectfully move: (1) to extend fact discovery through January 30, 2015, and (2) to vacate the current expert discovery deadline. The City is in agreement. Plaintiffs state the following in support:

1. On May 2, 2014, the Court set the following deadlines:

Fact Discovery Ordered Closed by:	October 3, 2014
Expert Discovery Ordered Closed by:	January 30, 2015

See ECF No. 95.

2. Since that time, the parties have worked to complete discovery. However, despite these efforts, they have determined that they need additional time to complete fact discovery and agreed to seek an extension through January 30, 2015.

3. As examples of the extensive work already completed, ten (10) individual Plaintiffs, including all five proposed class representations, have been produced for deposition. In addition, all 18 individually named Plaintiffs have responded to written discovery. In total, the parties have exchanged more than 25,000 documents.

4. At the same time, discovery of electronically stored information (ESI) has been delayed. Magistrate Judge Valdez is holding a hearing with the parties' technical experts on September 11, 2014 to resolve issues pertaining to the e-discovery protocol. *See* ECF No. 139.

5. Accordingly, the parties have agreed that fact discovery should be extended through January 30, 2015.

6. Extending fact discovery through January 30, 2015 would require resetting the expert discovery deadline. The parties have discussed but not yet agreed upon a proposed expert discovery schedule, with deadlines for each side's expert disclosures and a final deadline for expert discovery.

7. The extension of time for fact and expert discovery is not sought for any improper purpose and will allow the parties to complete both fact and expert discovery in a timely manner.

WHEREFORE, plaintiffs request the Court to grant this Motion to Extend Time for Fact and Expert Discovery, and to grant such other relief as the Court deems just.

Dated: September 8, 2014

Respectfully submitted,

/s Marni Willenson
Willenson Law, LLC
542 S. Dearborn Street, Suite 610
Chicago, IL 60605
(312) 546-4910
marni@willensonlaw.com

Susan P. Malone
542 S. Dearborn Street, Suite 610
Chicago, IL 60605
(312) 726-2638
smalonelaw@sbcglobal.net

David Borgen; CA Bar No. 099354
Goldstein, Borgen, Dardarian & Ho
300 Lakeside Drive, Suite 1000
Oakland, CA 94612
(510) 763-9800
dborgen@gbdhlegal.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that she served a true and correct copy of the foregoing document on all counsel of record through the Court's Electronic Case Filing (ECF) system on September 8, 2014.

/s Marni Willenson